

Exhibit 1



Elise Doak <elise@kbaattorneys.com>

Fwd: CPS Search Terms

Christina Graziano <Christina@kbaattorneys.com>
To: Elise Doak <elise@kbaattorneys.com>

Thu, Sep 2, 2021 at 2:11 PM

----- Forwarded message -----

From: **Gregg Viola** <Viola@ewmd.com>

Date: Wed, Jun 30, 2021 at 5:39 PM

Subject: RE: CPS Search Terms

To: Christina Graziano <Christina@kbaattorneys.com>, Mark Johnson <johnson@ewmd.com>

Cc: Justin Browne <justin@kbaattorneys.com>

Christina- As I believe Mark indicated in his email with the final production (which is not part of this string), we are not aware of any responsive information that have not been produced or identified on the privilege log. If we discover in the future a responsive document that was not previously produced, we will produce it. Thanks, Gregg

**Gregg E. Viola, Esq.****Eccleston & Wolf**

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From: Christina Graziano <Christina@kbaattorneys.com>**Sent:** Tuesday, June 29, 2021 10:40 AM**To:** Mark Johnson <johnson@ewmd.com>; Gregg Viola <Viola@ewmd.com>**Cc:** Justin Browne <justin@kbaattorneys.com>**Subject:** Re: CPS Search Terms

Mark and Gregg:

Thanks for the June productions you've sent over. Is it your position that you've now produced every document responsive to our requests (save anything identified in a privilege log)?

On Thu, Jun 10, 2021 at 10:45 AM Christina Graziano <Christina@kbaattorneys.com> wrote:

Mark and Gregg:

Asking yet again for these documents to be produced. When can we expect to receive the production from your search term/Trustpoint search?

CG

On Thu, May 27, 2021 at 11:21 AM Justin Browne <justin@kbaattorneys.com> wrote:

What is the timeline, mindful of upcoming depositions? Have you guys already looked at documents that pertain to our clients? To any other witness with a scheduled deposition?

On May 27, 2021, at 10:51 AM, Mark Johnson <johnson@ewmd.com> wrote:

We cannot provide you with the entire universe of documents because they are not all responsive, some of the documents are protected by the attorney-client privilege with communications between CPS and my office and Jim Aist's office, and some are work product in response to the litigation. We are reviewing the documents and will produce them on a rolling basis.

<image009.png>

Mark P. Johnson, Esq.

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